

## **Waste Prevention Subcommittee Comments On Solid Waste Comprehensive Plan**

### **General Comments on Plan:**

- All instances of “Source Reduction” in the plan should be changed to “Waste Prevention”, with an explanation in the glossary that the term Waste Prevention has replaced Source Reduction in the industry.
- Many recommendations and initiatives in the plan are ambiguous with respect to assigned responsibility and timetable for implementation.
- The “tone” in several areas of the plan should be positive, and any “apologist” sentiments should be eliminated, e.g. p. 6.1 “RIRRC found itself alone ...”
- Formatting of the plan to include ‘boxes’ & matrices should be considered to highlight particularly significant issues.
- PAYT – given that PAYT impacts both waste prevention and municipal recycling it should become its own section rather than being included in Municipal Recycling section.

### **Section 6-2-1**

- Background should be reduced and tailored so that a basic level of knowledge on the part of the reader is assumed. The plan is not intended to be read strictly by a lay-person.
- More information about the State statutes and the status of/lack of enforcement of the statutes should be addressed. Responsibility for enforcement of the Statutes should be included.
- “Box” or other visual mechanism should be used to highlight what committee views as a particularly salient issue; p. 6.3 “From 1998 through 2002 funding was not provided for waste prevention programs.”
- EPP –
  - Paragraph on EPP (last in introduction) should be a “side bar” and be combined with information on p. 6.7 about EPP in Rhode Island;
  - Information about requirements in the law and the State’s record on EPP should be included;
  - Recommendation should be included that State’s MPA include EPA’s EPP standards;
  - Examples of MA EPP program should be included.

### **Section 6-2-2**

- This Section should be re-organized in the following way:

- I. RIRRC Programs
- II. Grant Funded Programs
- III. Regional & National Programs (NERC, TPCH)

### **Section 6-2-3**

- Change the tone of third paragraph, “Although some waste prevention programs can be difficult to implement and sustain...” To “While waste prevention programs are challenging...”
- Identification for responsibility and provision for funding for enforcement of the state statutes should be included in this section.

### **Section 6-2-4**

- Discussion of funding mechanism for waste prevention is ambiguous,
  - Specific examples of funding mechanisms from other states e.g. PA (cited elsewhere in the plan) should be included here; or
  - Text to the effect of, “RIRRC should include staff and consistent, stable long-term funding for waste prevention program.
  - Responsibility and accountability for waste prevention program need to be identified
  - Goal for waste prevention program should be included (e.g. 5%) with recommendations for measurement mechanism (under “i” below).
- Section should be re-organized in the following way:
  - a. Bullet “c” - Establish a State Waste Prevention Program
    - i. Establish Waste Prevention Task Force
    - ii. Set Waste Prevention goal
  - b. Initiate an Aggressive Government Environmentally Preferable Purchasing Program
  - c. Establish/Expand Reuse Programs
  - d. Mandate Paper Waste Prevention Programs
  - e. Review Existing Waste Prevention-related Statutes and Regulations.
  - f. Develop and implement model reduction projects for institutional and commercial waste streams.
  - g. Increase Education, Outreach, and Technical Assistance

### **Comments on Section 6-3 (Municipal Recycling)**

- Waste Composition Analysis – The methodology should include interviews with residents as well “recovery analysis” for recyclables.
- Separate PAYT from this section (as indicated above)